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June 22, 2016

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VIA ELECTRONIC COMMENT FILING SYSTEM

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Notice of Ex Parte Communication – In the Matter of PCS Partners, L.P. Petition for Waiver of 47 C.F.R. § 90.353(b) and Request for Extension of Time and for Expedited Treatment, WT Docket No. 16-149, File Nos. 0007232430 et al.

Dear Ms. Dortch:

On June 20, 2016, David Behenna of PCS Partners, L.P. (“PCSP”), Dr. Nat Natarajan, Principal Engineer, Roberson & Associates, LLC, John Stoner, General Counsel, Roberson and Associates, LLC, and Jessica Gyllstrom and the undersigned of Telecommunications Law Professionals PLLC, met with Suzanne Tetreault, Roger Noel, Chris Helzer, Dr. Kamran Etemad, and Heather Moelter of the Wireless Telecommunications Bureau (“WTB”) and Paul Murray of the Office of Engineering and Technology. Melissa Conway of WTB also participated via teleconference.

At the meeting, PCSP’s representatives provided background on its above-referenced Petition,¹ including the unique sharing environment of the 902-928 MHz band, the history of underutilization of the licensed Multilateration and Location Monitoring Service (“M-LMS”) bands, and the current extent of deployment by M-LMS licensees. We summarized PCSP’s request for waiver of Section 90.353(b) of the Commission’s rules with respect to PCSP’s licensed M-LMS A Block sub-band (904.0-909.75 MHz), and the request for relief from the current construction deadlines, as set forth in detail in the Petition.

We also discussed the responses to the Public Notice² seeking public comment on the Petition, all but one of which were made by Part 15 stakeholders. We discussed in detail those parties’ objections to the request for waiver, and their assertions of potential interference to unlicensed Part 15 operations. The

¹ PCS Partners, L.P., Petition for Waiver of 47 C.F.R. § 90.353(b), and Request for Extension of Time and For Expedited Treatment, WT Docket No. 16-149, File Nos. 0007232430 et al. (filed Apr. 15, 2016) (“Petition”).

² Public Notice, Wireless Telecommunications Bureau Seeks Comment on PCS Partners’ Request for Multilateration Location and Monitoring Service Waiver and Construction Extension, DA 16-491, WT Docket No. 16-149 (May 4, 2016).



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discussion was consistent with PCSP's Reply Comments in WT Docket No. 16-149.³ In particular, PCSP explained the basis for its position that its proposed operations are unlikely to cause interference to Part 15 users. Dr. Natarajan addressed questions concerning various operational matters, including power limits, data rates, and bandwidth usage and duty cycle. PCSP further noted that it has consistently acknowledged its obligation to undertake field testing prior to commencement of services, in accordance with Commission rules. PCSP also explained that its proposed solution will utilize equipment incorporating the 3GPP LTE standard to provide both location-based M-LMS and narrowband Internet of Things service offerings, and briefly discussed its discussions to date with various equipment vendors.

Finally, we discussed PCSP's proposed milestones and the rationale for the extension set forth in the Petition, and PCSP reiterated its request for prompt regulatory relief.

This notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me with any questions.

Sincerely,

/s/ E. Ashton Johnston

E. Ashton Johnston
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Suzanne Tetreault
Roger Noel
Chris Helzer
Dr. Kamran Etemad
Heather Moelter
Melissa Conway
Paul Murray

³ Reply Comments of PCS Partners, L.P., WT Docket No. 16-149, File Nos. 0007232430 et al. (filed June 3, 2016) ("Reply Comments").